

Index to Volume 22

Title Index

<i>Athanasios v. Comm'r: Corporate Separations and Equalization, Daniel M. Schneider & Paul E. Hoelschen, Jr.</i>	326
Compensation and Fringe Benefits, David W. Ellis:	
Proposed Fringe Benefit Regulations Regarding Club Dues, Meal and Entertainment Expenses, and Spousal Travel	265
Withholding Tax on Retirement Plan Distributions to Employees Working in Puerto Rico.....	70
Consolidated Returns, Bryan P. Collins:	
COD Income and Basis in Subsidiary Stock	151
Election and Statement Requirements Proliferate	339
Consolidated Returns, Bryan P. Collins & Nissley, P. Anthony: Determining Voting Power Under Section 1504(a)(2).....	255
Consolidated Returns, Bryan P. Collins & Barbara Young: Section 446: A Trap for the Unwary in the Treatment of Transactions Between Members of a Consolidated Group	76
[The] Continuity of Business Enterprise Requirement: A Field Theory, Robert A. Rizzi	60
[The] Definition of "Purchase" in Section 338 Needs to Be Refined, Pano G. Pliotis	293
Downstream Reorganizations of Holding Corporations Owning Minority Stock Interests, Ira Akselrad & Robert S. Bernstein	66
Earnings and Profits Under the New Consolidated Return Regulations, Robert L. Bean	36
[The] General Signal Case and Welfare Benefit Fund Deductions, Patrick T. Navin	170
International Developments, Howard S. Engle:	
Final Regulations on "Dollar Approximate Separate Transaction Method" of Accounting for Hyperinflationary Currencies ...	86
Final Regulations Under Section 6038—Revised Form 5471, Information Return of U.S. Persons with Respect to Certain Foreign Corporations	280

Index to Volume 22

Title Index

<i>Athanasios v. Comm'r: Corporate Separations and Equalization, Daniel M. Schneider & Paul E. Hoelschen, Jr.</i>	326
Compensation and Fringe Benefits, David W. Ellis:	
Proposed Fringe Benefit Regulations Regarding Club Dues, Meal and Entertainment Expenses, and Spousal Travel	265
Withholding Tax on Retirement Plan Distributions to Employees Working in Puerto Rico.....	70
Consolidated Returns, Bryan P. Collins:	
COD Income and Basis in Subsidiary Stock	151
Election and Statement Requirements Proliferate	339
Consolidated Returns, Bryan P. Collins & Nissley, P. Anthony: Determining Voting Power Under Section 1504(a)(2).....	255
Consolidated Returns, Bryan P. Collins & Barbara Young: Section 446: A Trap for the Unwary in the Treatment of Transactions Between Members of a Consolidated Group	76
[The] Continuity of Business Enterprise Requirement: A Field Theory, Robert A. Rizzi	60
[The] Definition of "Purchase" in Section 338 Needs to Be Refined, Pano G. Pliotis	293
Downstream Reorganizations of Holding Corporations Owning Minority Stock Interests, Ira Akselrad & Robert S. Bernstein	66
Earnings and Profits Under the New Consolidated Return Regulations, Robert L. Bean	36
[The] General Signal Case and Welfare Benefit Fund Deductions, Patrick T. Navin	170
International Developments, Howard S. Engle:	
Final Regulations on "Dollar Approximate Separate Transaction Method" of Accounting for Hyperinflationary Currencies ...	86
Final Regulations Under Section 6038—Revised Form 5471, Information Return of U.S. Persons with Respect to Certain Foreign Corporations	280

Impact of the <i>Xerox</i> Case on the Computation of the Deemed-Paid Foreign Tax Credit From UK Corporations	354
Mexico—Devaluation of the Mexican New Peso	273
New U.S. Treaties Signed with Reorganizations France and Sweden	95
Notice 94-90—Notification Requirements for Multinationals Making Retroactive Section 197 Amortization Elections	91
Proposed Conduit Financing Regulations	178
United States—Canada Treaty Protocol	93
Inverted Mirrors: The Service Reflects on Corporate Inversion Transactions, Robert A. Rizzi	103
[The] IRS Provides a Roadmap for LLC Taxation, Richard M. Horwood & Jeffrey A. Hechtman	247
Is <i>Yoc</i> Dead? Revelations in Proposed Section 338 Regulations for Two-Step Mergers, Robert A. Rizzi	293
Over the Top: Proposed Triangular Reorganization Regulations Lead by Example, Robert A. Rizzi	199
Private Letter Rulings, Gilbert D. Bloom:	
LTR Potpourri: Old and Cold; Recast; No Rule; Inversion; Voting Trust	166
Mysterious Revocation Under Section 304	162
Third Generation of Corporate Charter Sales	165
[The] Triple Bootstrap Spin-Off	262
Recent Developments, Craig W. Friedrich:	
Break-Up Fees Paid to Unsuccessful White Knight Held Deductible as Ordinary Business Expense or as Abandonment Loss	193
Exchange of Stock in Merger Following Contested Tender Offer Deemed to Be Reorganization Exchange Resulting in Nonrecognition of Loss	282
IRS Rules That Severance Pay Remains Currently Deductible After <i>INDOPCO</i>	368
Redemption Distribution Treated as Dividend Reduces S Corporation's Accumulated Adjustments Account	367
Reversing Itself, IRS Announces Multiple S Corporations Formed to Avoid Stockholder Number Limit Will Be Respected	97

Recent Cases Complicate Redemptions of Stock Incident to a Divorce, Jerald David August & Mitchell D. Schepps	112
Standard Plan Amendment Provision Upheld, Brian K. Wydajewski ..	347
Start-up Expenditures: Compliance and Planning Issues, Mark B. Persellin & E. Shawn Novak	141
Supreme Court Upholds California's Unitary Taxation of Foreign Multinationals, Steven D. Erdahl	3
U.S. Tax Integration and the Foreign Shareholder, Kimberly Tan Majure	207

Index to Volume 22

Author Index

Akselrad, Ira & Bernstein, Robert S., Downstream Reorganizations of Holding Corporations Owning Minority Stock Interests	66
August, Jerald David & Schepps, Mitchell D., Recent Cases Complicate Redemptions of Stock Incident to a Divorce	112
Bean, Robert L., Earnings and Profits Under the New Consolidated Return Regulations	36
Bloom, Gilbert D., Private Letter Rulings:	
LTR Potpourri: Old and Cold; Recast; No Rule; Inversion; Voting Trust	166
Mysterious Revocation Under Section 304	162
Third Generation of Corporate Charter Sales	165
The Triple Bootstrap Spin-Off	262
Collins, Bryan P., Consolidated Returns:	
COD Income and Basis in Subsidiary Stock	151
Election and Statement Requirements Proliferate	339
Collins, Bryan P. & Nissley, P. Anthony:	
Determining Voting Power Under Section 1504(a)(2)	255
Collins, Bryan P. & Young, Barbara, Consolidated Returns: Section 446: A Trap for the Unwary in the Treatment of Transactions Between Members of a Consolidated Group	76
Ellis, David W., Compensation and Fringe Benefits:	
Proposed Fringe Benefit Regulations Regarding Club Dues, Meal and Entertainment Expenses, and Spousal Travel	265
Withholding Tax on Retirement Plan Distributions to Employees Working in Puerto Rico	70
Engle, Howard S., International Developments:	
Final Regulations on "Dollar Approximate Separate Transaction Method" of Accounting for Hyperinflationary Currencies ...	86
Final Regulations Under Section 6038—Revised Form 5471, Information Return of U.S. Persons With Respect to Certain Foreign Corporations	280

Impact of the <i>Xerox</i> Case on the Computation of the Deemed-Paid Foreign Tax Credit from UK Corporations	354
Mexico—Devaluation of the Mexican New Peso	273
New U.S. Treaties Signed With France and Sweden	95
Notice 94-90—Notification Requirements for Multinationals Making Retroactive Section 197 Amortization Elections	91
Proposed Conduit Financing Regulations	178
United States—Canada Treaty Protocol	93
Erdahl, Steven D., Supreme Court Upholds California's Unitary Taxation of Foreign Multinationals, Steven D. Erdahl	3
Friedrich, Craig W., Recent Developments:	
Break-Up Fees Paid to Unsuccessful White Knight Held Deductible as Ordinary Business Expense or as Abandonment Loss	193
Exchange of Stock in Merger Following Contested Tender Offer Deemed to Be Reorganization Exchange Resulting in Nonrecognition of Loss	282
IRS Rules That Severance Pay Remains Currently Deductible After <i>INDOPCO</i>	368
Redemption Distribution Treated as Dividend Reduces S Corporation's Accumulated Adjustments Account	367
Reversing Itself, IRS Announces Multiple S Corporations Formed To Avoid Stockholder Number Limit Will Be Respected	97
Horwood, Richard M. & Hechtman, Jeffrey A., The IRS Provides a Roadmap for LLC Taxation	247
Majure, Kimberly Tan, U.S. Tax Integration and the Foreign Shareholder	207
Navin, Patrick T., The General Signal Case and Welfare Benefit Fund Deductions	170
Persellin, Mark B. & Novak, E. Shawn, Start-up Expenditures: Compliance and Planning Issues	141
Pliotis, Pano G., The Definition of "Purchase" in Section 338 Needs to be Refined	306
Rizzi, Robert A., The Continuity of Business Enterprise Requirement: A Field Theory	60
Rizzi, Robert A., Inverted Mirrors: The Service Reflects on Corporate Inversion Transactions	103

INDEX TO VOLUME 22

375

- Rizzi, Robert A., *Is Yoc Dead? Revelations in Proposed Section 338 Regs for Two-Step Mergers* 293
- Rizzi, Robert A., "Over the Top": Proposed Triangular Reorganization Regulations Lead by Example 199
- Schneider, Daniel M. & Hoelschen, Jr., Paul E., *Athanasios v. Comm'r: Corporate Separations and Equalization* 326
- Wydajewski, Brian K., Standard Plan Amendment Provision Upheld . 347